UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

PEDIO VAIGASI,

Plaintiff,

Civil Action No.: 11-cv-5088 (RMB)(HBP)

Pro Se

Electronically Filed

against

SOLOW MANAGEMENT CORP., et al.,

Defendants.

DECLARATION OF STEFAN SOLOVIEV¹

Pursuant to the Court's February 16, 2016 Opinion and Order (Doc. 302) in the above-referenced action, I, Stefan Soloviev, hereby declare, under penalty of perjury, as follows:

- 1. I hold the position of Executive Vice President with Defendant Solow Realty & Development Company, LLC ("Solow Realty"). In that capacity, I have executive oversight and high-level management responsibility for each of the wholly-owned subsidiaries of Solow Realty, which include Defendants Solow Management Corp., Solow Realty & Development Company, LLC, Townhouse Company, LLC, and Solow East River Development Company, LLC (collectively, with Solow Realty, the "Solow Defendants").
- 2. I understand that Plaintiff, Pedio Vaigasi, is a former employee of the Solow Defendants and has instituted a law suit against the Solow Defendants and several individuals, including myself. I am also aware that Plaintiff alleges he worked for the Solow Defendants from approximately 2005 until approximately 2011 at various residential properties. During that time, I did not interact with Plaintiff or manage or supervise Plaintiff's work in any manner.
- 3. I have no personal knowledge of any of the events underlying Plaintiff's claims in the above-referenced action, including with respect to any of the allegations contained in the

¹ Incorrectly identified in the litigation as Stefan Solow.

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Third Amended Complaint (Doc. 111), independent of what I have learned from my counsel or counsel for the Solow Defendants in this litigation.

Dated: 3-2-2016

Stefan Solow

Solovier